

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

TRACY LUTTRELL,)
Plaintiff,) No. 08 C 1774
v.) Judge Gettlemann
MADISON APARTMENT GROUP, L.P. and) Magistrate Judge Keys
BPG PROPERTIES, LTD.,)
Defendants.)

PLAINTIFF'S RULE 26(a)(1) DISCLOSURES

NOW COMES Plaintiff Tracy Luttrell (“Luttrell”) by her undersigned attorneys and hereby submits the following initial disclosures in discovery pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure:

(a) Persons With Knowledge:

1. Tracy Luttrell; 1717 Brook Road, Charlotte, NC 28205
2. Michele Helbing, M.D., Advocate Illinois Masonic Physician Group, 1945
venue, Suite 2100, Chicago, Illinois 60640;
3. Charles E. Miller, M.D., The Advanced Gynecologic Surgery Institute,
Road, Suite L125, Schaumburg, Illinois 60173;
4. Anne Marie Niklaus, Madison Apartment Group;
5. Bobbie McGonigle, Madison Apartment Group;
6. Mark Gutierrez, Madison Apartment Group;
7. Maggie Ratner, Madison Apartment Group;
8. Sara Dionese, Madison Apartment Group;

9. Mary Oaks, Columbia College Chicago

Investigation continues.

(b) Documents:

1. Employee evaluations for Tracy Luttrell;
2. Expense reports for Tracy Luttrell;
3. Personnel file for Tracy Luttrell;
4. Email correspondence between Tracy Luttrell and Madison Apartment Group, L.P. and/or BPG, Ltd. employees, including but not limited to Bobbi McGonigle and/or Anne Marie Niklaus;
5. Physician's reports and/or releases for Tracy Luttrell;
6. Eviction notices served on Tracy Luttrell on behalf of Madison Apartment Group, L.P.

Investigation continues.

(c) Computation of damages:

From July 26, 2007 to August 7, 2007, Defendant Madison Apartment Group, L.P. required that Plaintiff use vacation time valued at approximately \$1,700.00 to obtain multiple releases from her physician. Defendants' insurance provider denied the last claim, of approximately \$9,800.00, incurred while Plaintiff was still employed by Defendants. On January 30, 2008, Plaintiff was served with a Notice of Eviction by the Sheriff of Cook County and was forced to relocate outside the state of Illinois to a residence in South Carolina at a cost of approximately \$4,000.00. During that time, Plaintiff was without health insurance and could not afford medical treatment following her surgery. To support herself during this time, Plaintiff was forced to borrow funds from her credit card provider, totaling approximately \$18,000 and

incurred interest at the rate of 19%. Plaintiff mitigated her damages by obtaining new employment beginning February 11, 2008. She was without employment from November 27, 2007 through February 10, 2008 and incurred a loss of income of \$18,040.37. Due to the loss of her employment and residence, Plaintiff suffered a loss of at least \$51,540. In accordance with 29 U.S.C. § 2617(a) that amount should be doubled. Plaintiff is also seeking damages associated with the pain and suffering associated with her common law retaliation claim as well as her attorneys' fees and costs.

(d) Insurance Agreements:

Plaintiff has no such documents.

Plaintiff TRACY LUTTRELL

By: 
One of Her Attorneys

Joel J. Bellows, Esq.
Kristen E. Prinz, Esq.
BELLOWS AND BELLOWS, P.C.
209 South LaSalle Street, Suite 800
Chicago, Illinois 60604
(312) 332-3340
(312) 332-1190 (facsimile)

CERTIFICATE OF SERVICE

I, Priscella Medina, a non-attorney, being first duly sworn upon oath, do hereby certify that copies of Plaintiff's Rule 26(a)(1) Disclosures was served upon addressee at the address below by e-filing on or before 5:00 p.m. on the 20th day of May, 2008.

TO: Jon E. Klinghoffer
GOLDBERG KOHN BELL BLACK
ROSENBLUM & MORITZ, LTD.
55 East Monroe Street
Suite 3300
Chicago, Illinois 60603

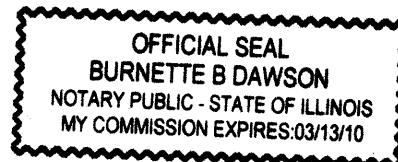


Priscella Medina

SUBSCRIBED and SWORN to
before me this 20th day of May, 2008.



Burnette B. Dawson
Notary Public



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Plaintiff,)
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MADISON APARTMENT GROUP, L.P., and)
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No. 08 C 1774
Judge Gettleman
Magistrate Judge Keys

NOTICE OF E-FILING

TO: Jon E. Klinghoffer
GOLDBERG KOHN BELL BLACK
ROSENBLUM & MORITZ, LTD.
55 East Monroe Street
Suite 3300
Chicago, Illinois 60603

PLEASE TAKE NOTICE that on May 20, 2008 we filed with the United States District Court for the Northern District of Illinois, Eastern Division, **Plaintiff's Rule 26(a)(1) Disclosures**, a copy of which is hereby served upon you.

Dated: May 20, 2008

Respectfully submitted,

TRACY LUTTELL

By: /S/ Kristen E. Prinz
One of her Attorneys

Joel J. Bellows
Kristen E. Prinz
BELLOWS AND BELLows, P.C.
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